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The Honorable Cathy L. Waldor
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Redus v. New York Life Inv. Mgmt., LLC*, 2:14-cv-7991

Dear Judge Waldor:

Defendant New York Life Investment Management, LLC (“Defendant”) has requested an extension of its time to answer, move, or otherwise respond to the Complaint filed by Plaintiffs. Plaintiffs have consented to Defendant’s request. The parties also have agreed upon a proposed briefing schedule in the event Defendant files a motion in response to the Complaint.

A Joint Stipulation and [Proposed] Order giving effect to the parties’ agreements is enclosed for Your Honor’s consideration.

Defense counsel is in the process of seeking local counsel, and have informed Plaintiffs they will promptly file their *Pro Hac Vice* applications once local counsel is retained. Plaintiffs will not oppose those applications.

The parties are happy to discuss any questions the Court may have. We appreciate Your Honor’s consideration.

Respectfully submitted,

/s/ Robert Lakind

Robert Lakind

cc: Jamie Fleckner (via email)